



**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

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ADMIN RECORD

96-RF-01632

March 13, 1996

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JUSTIFICATION FOR MISSION NEED - DES-014-96

Action: Please review and return any comments

The following is a Justification for Mission Need for the CAMU project. This is based upon our interpretation of DOE Order 4700.1A.

DOE Order 4700.1A 7 b. (1) (d) states "For projects initiated by an Executive Order, congressional Act, Federal Facility Agreement, or Presidential or Secretarial Announcement, the edict shall serve as the Approval of Mission Need Critical Decision".

On December 15, 1995 the January 22, 1991, Interagency Agreement (IAG), also known as a Federal Facility Agreement and Compliance Order (FFA/CO), was modified to include a re-structured Environmental Restoration (ER) baseline. In a letter to Mark Silverman dated December 15, 1995, from Jack McGraw of the EPA and Tom Looby of CDPHE, both agencies approved this new ER baseline. The letter stated that "The ER baseline reflects the new priorities that have arisenand is consistent with the proposed Vision." Later it is stated, "These priorities and milestones are hereby incorporated into the IAG and supersede existing IAG milestones."

The new ER baseline includes an activity for an On-site Disposal Cell with a priority level of 1. This baseline is an enforceable attachment to the FFA/CO and is considered to be an integral part of the document. In addition, language included in the draft Rocky Flats Cleanup Agreement (RFCA) due to be signed by the DOE, State of Colorado, and the EPA also explicitly identifies the CAMU project. The RFCA will eventually supersede the existing IAG. This appears to be consistent with the intent of the language in the DOE order.

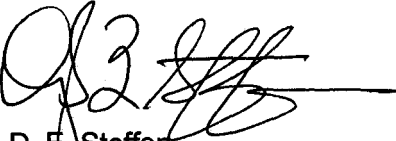
The FY 96 deliverables are consistent with the items identified as the "Conceptual Phase" per 4700.1A. These include an adequate design basis, technical objectives, schedules, alternatives analyses, NEPA documentation, site selection, stakeholder input, and value engineering studies. These items are incorporated into the decision document and conceptual design report.

4700.1A also states that, "Because of the nature of ER projects, wherein all five phases of the project may occur simultaneously, the conceptual phase would be completed later than for a conventional project." All scope currently being performed appears to fall within the definition of the conceptual phase prior to KD-1 requirements.

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Another issue for consideration is the requirement for the KD process, as it is applied to this project. A DOE document dated March 1993, titled "Project Management Notebook", and approved by then Deputy Assistant Secretary for Environmental Restoration, R. P. Whitfield, states on page three, second paragraph that "Key decisions are inappropriate for EM-40. For system compliance reviews for EM-40, KD-1 equates to the approval of the Project Plan." This project is currently funded by EW-20 funds and managed by EM-40. The question remains as to whether or not this interpretation is current.

In summary, it appears that this project is in compliance with the process defined in DOE Order 4700.1A. Please feel free to call me extension 8655, if you need anything else.



D. E. Steffen
Project Manager
Waste Management Facility
RMRS, L. L. C.

ECM:cb

Attachment: 
As Stated

cc:

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Projects File
22.053